

Valdez, Heather

From: Sally McLeod <sally.mcleod@smmpogo.com>
Sent: Tuesday, June 11, 2013 11:30 AM
To: Valdez, Heather
Subject: RE: Status of Petition

Categories: Pogo FOIA

I have some technical background. I've been involved with PM and PM10 stack testing. I have no previous experience with incinerators or incinerator testing. Nor do I have any Title V permitting experience. My boss, Chris Kennedy, has no technical background or experience with air quality permitting.

We are using Mr. Mike Short with Specialized Environmental Solutions as our air quality permitting consultant. We are using Mr. John Rosburg with AECOM to conduct all the stack testing. And we use Perkins Coie, Mr. Jeff Hunter and Mr. Eric Fjelstad to assist us with environmental legal matters.

I would be happy to invite Mike Short to join us on the call. John is in the field and I would prefer not to involve attorneys at this point in the process.

Sally S. McLeod, CEM, REM
Environmental Superintendent
Sumitomo Metal Mining Pogo LLC
Office: 907-895-2879 (Mon-Thurs)
Cell: 907-978-3774 (Fri-Sun)
Fax: 907-895-2866

From: Valdez, Heather [mailto:Valdez.Heather@epa.gov]
Sent: Tuesday, June 11, 2013 10:23 AM
To: Sally McLeod
Subject: RE: Status of Petition

Hi Sally, let's go with 12:30 – 1:30pm, that would be Seattle time, just to be safe I am not late coming from my previous appointment.

We can use this number, 866-299-3188, code 206-553-6313

You mentioned you would have another person with you on the call? We wanted to get a sense of your levels of background, would either of you be the contact for technical details? Do you have any other consultants involved?

Thanks Sally

Heather Valdez
Chemical Engineer
EPA Region 10
Office of Air, Waste and Toxics
1200 6th Ave, Suite 900, AWT-107
Seattle WA, 98101
(206) 553-6220
valdez.heather@epa.gov

R10 RICE Website, Engine Compliance Assistance

http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice_rules

Boiler Area Source Compliance Assistance

<http://www.epa.gov/boilercompliance/>

Department of Energy Website on Energy Assessments

http://www1.eere.energy.gov/manufacturing/tech_deployment/energy_assessment.html

Non-Hazardous Secondary Materials

<http://www.epa.gov/epawaste/nonhaz/define/index.htm>

Combustion Regulatory Actions

<http://www.epa.gov/airquality/combustion/actions.html>

Boiler TTN Page

<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>

RICE TTN Page

<http://www.epa.gov/ttn/atw/rice/ricepg.html>

Combustion Portal (compliance assistance for combustion regulations)

<http://www.combustionportal.org/>

From: Sally McLeod [<mailto:sally.mcleod@smmpogo.com>]

Sent: Tuesday, June 11, 2013 10:58 AM

To: Valdez, Heather

Subject: RE: Status of Petition

Oh, I forgot to ask...is that 12:15 pm Seattle time or Alaska time?

Sally S. McLeod, CEM, REM

Environmental Superintendent

Sumitomo Metal Mining Pogo LLC

Office: 907-895-2879 (Mon-Thurs)

Cell: 907-978-3774 (Fri-Sun)

Fax: 907-895-2866

From: Valdez, Heather [<mailto:Valdez.Heather@epa.gov>]

Sent: Tuesday, June 11, 2013 8:30 AM

To: Sally McLeod

Subject: RE: Status of Petition

Hi Sally, I have good news, I just confirmed that we can do Wednesday sometime between 12:15 and 2:15pm. Hopefully an hour during that time period will work for you. Thanks

Heather Valdez

Chemical Engineer

EPA Region 10

Office of Air, Waste and Toxics

1200 6th Ave, Suite 900, AWT-107

Seattle WA, 98101

(206) 553-6220

valdez.heather@epa.gov

~~~~~

R10 RICE Website, Engine Compliance Assistance  
[http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice\\_rules](http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice_rules)

Boiler Area Source Compliance Assistance  
<http://www.epa.gov/boilercompliance/>

Department of Energy Website on Energy Assessments  
[http://www1.eere.energy.gov/manufacturing/tech\\_deployment/energy\\_assessment.html](http://www1.eere.energy.gov/manufacturing/tech_deployment/energy_assessment.html)

Non-Hazardous Secondary Materials  
<http://www.epa.gov/epawaste/nonhaz/define/index.htm>

Combustion Regulatory Actions  
<http://www.epa.gov/airquality/combustion/actions.html>

Boiler TTN Page  
<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>

RICE TTN Page  
<http://www.epa.gov/ttn/atw/rice/ricepg.html>

Combustion Portal (compliance assistance for combustion regulations)  
<http://www.combustionportal.org/>

---

**From:** Sally McLeod [<mailto:sally.mcleod@smmpogo.com>]  
**Sent:** Friday, June 07, 2013 7:50 PM  
**To:** Valdez, Heather  
**Subject:** Re: Status of Petition

I am very sorry but I will be tied up in Agency meetings all day Thursday. Is there anyway we can do it on Monday, Tuesday or Wednesday?

Sally McLeod  
Environmental Superintendent  
Sumitomo Metal Mining Pogo LLC

On Jun 7, 2013, at 3:24 PM, "Valdez, Heather" <[Valdez.Heather@epa.gov](mailto:Valdez.Heather@epa.gov)> wrote:

Hi Sally, We would be available next Thursday for a phone call with you to discuss the petition and some initial ideas we have about that. Would some time on the 13th before 1:30 pm work for you?

Heather Valdez  
Chemical Engineer  
EPA Region 10  
Office of Air, Waste and Toxics  
1200 6th Ave, Suite 900, AWT-107  
Seattle WA, 98101  
(206) 553-6220  
[valdez.heather@epa.gov](mailto:valdez.heather@epa.gov)

~~~~~  
R10 RICE Website, Engine Compliance Assistance
http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice_rules

Boiler Area Source Compliance Assistance
<http://www.epa.gov/boilercompliance/>

Department of Energy Website on Energy Assessments
http://www1.eere.energy.gov/manufacturing/tech_deployment/energy_assessment.html

Non-Hazardous Secondary Materials
<http://www.epa.gov/epawaste/nonhaz/define/index.htm>

Combustion Regulatory Actions
<http://www.epa.gov/airquality/combustion/actions.html>

Boiler TTN Page
<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>

RICE TTN Page
<http://www.epa.gov/ttn/atw/rice/ricepg.html>

Combustion Portal (compliance assistance for combustion regulations)
<http://www.combustionportal.org/>

From: Sally McLeod [<mailto:sally.mcleod@smmpogo.com>]
Sent: Friday, June 07, 2013 10:40 AM
To: Valdez, Heather
Subject: Fwd: Status of Petition

Hi Heather. I work Mon-thurs and have company this weekend. Could we talk on Monday at 10:00 am Alaska time? I can call you if you send me your number. I really appreciate the EPA's prompt review of our petition. We will do our best to address all your concerns.

Sally McLeod
Environmental Superintendent
Sumitomo Metal Mining Pogo LLC

Begin forwarded message:

From: "Wilson, Wenona" <Wilson.Wenona@epa.gov>
Date: June 7, 2013, 9:25:22 AM AKDT
To: "sally.mcleod@smmpogo.com" <sally.mcleod@smmpogo.com>
Cc: "Valdez, Heather" <Valdez.Heather@epa.gov>
Subject: Status of Petition

Sally,

Thank you for submitting Sumitomo Metal Mining Pogo LLC's (Pogo's) petition for approval of specific operating limits to be established during the initial performance test and continuously monitored thereafter, pursuant to the requirements of 40 C.F.R. § 60.2115. Region 10 staff, led by Heather Valdez, began review of the petition upon receipt.

We have completed an initial, informal review and unfortunately, have identified substantive issues with the petition that will likely prevent approval of the petition in its current form. Rather than continue with processing of the petition, we suggest working together to address these barriers so the petition can be revised to address our concerns before we make the final determination. This should save time for both Pogo and for EPA.

With that said, given the tight timeframe and the issues with the petition, it is evident we will not complete formal review of the petition by the proposed test date of June 24. However, we do commit to working with you so the petition can be revised and processed in an expeditious manner.

Heather Valdez will contact you to offer a meeting to discuss our initial observations with the petition and to identify next steps.

Thank you,

Wenona Wilson, Manager
Tribal and Air Toxics Unit
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140
Phone (206) 553-2148